

Application No.: 10/644,947
Amendment dated: October 10, 2006
Reply to Office Action dated: April 10, 2005

RECEIVED
CENTRAL FAX CENTER
OCT 10 2006

REMARKS/ARGUMENTS

Claims 23-32 are pending in the application. Claims 23-31 are rejected under 35 U.S.C. §102(b) as being anticipated by Hollowell, previously cited (U.S. Patent No. 6,071,056). Claim 32 is rejected under 35 U.S.C. §103(a) as being unpatentable over Hollowell, in view of Waneky, previously cited (U.S. Patent No. 3,263,841). Claims 23-31 are rejected under 35 U.S.C. §103(a) as being unpatentable over Hollowell in view of Grover (US 2,355,643), Vaughn (US 2,370,698), Pakeriasamy (US 5,848,702), or Carter (US 6,375,408), all previously cited. Claims 32 is rejected under 35 U.S.C. §103(a) as being unpatentable over Hollowell in view of Grover, Vaughn, Pakeriasamy, or Carter, as applied to claims 23-31 above, and further in view of Waneky. Claim 23 is amended.

Applicants respectfully submit none of the cited references teach, suggest or describe at least “[a] method, comprising: ... *inverting an exchange tray with an exchange containment unit with respect to the packing tray in matching the packing containment unit...*” (e.g., as described in amended claim 23).

The Office Action alleges Hollowell teaches the limitations of claim 23. The Applicants respectfully traverse these rejections. Hollowell discloses a tray used during the processing and handling of HGAs having a set of locating and support features on both its top and bottom surfaces. (See Abstract). Column 2, lines 61-67 of Hollowell state:

In operation, an HGA 13 is placed in a position on tray 11. The HGA may be placed on either top 15 or bottom 17, but only one side can be populated at any time. During use, either top 15 or bottom 17 can hold up to thirty HGAs 13. When another tray 11 is nested on top of the populated tray 11, the trays can be flipped over or inverted 180 degrees to reorient the HGAs 13 without having to manipulate them.

Application No.: 10/644,947

Amendment dated: October 10, 2006

Reply to Office Action dated: April 10, 2005

In Hollowell, the exchange apparatus is on the bottom of the tray used for packing, rather than as a separate tray. Thus the tray does not need to be inverted prior to being placed on the tray used for packing. Therefore, Hollowell does not describe all the elements of the claims, as set forth in claim 23. Since at least this feature of claim 23 are missing from Hollowell, claim 23 is not anticipated under 35 U.S.C. §102(b).

The Office Action further argues that the alleged exchange tray into which the components are moved when the packing and exchange trays are rotated together is considered to inherently be "inverted" prior to positioning above the packing tray, even though not explicitly recited by Hollowell. *See* Office Action dated 4/10/2006, paragraph 2. Applicants submit this is both incorrect and inadequate to support a proper rejection of claim 1.

The packing trays of Hollowell are stacked on top of one another, and are configured to engage to that end. *See Abstract* ("When the tracks are stacked one on top of another, they nest so that the features on a top side of each of the trays do not interfere with the features on a bottom side of the adjacent trays.") This is insufficient to describe a method, comprising *inverting* an exchange tray with respect to the packing tray while matching the exchange containment unit of the exchange trays with the packing containment unit of the packing tray.

As shown above, the Hollowell trays are simply stacked on top of one another.

The Waneskey, Grover, Vaughn Pakeriasamy and Carter references do not cure this deficiency as they fail to teach the relevant limitations discussed above.

Therefore, since each and every limitation is not taught or suggested in the cited references, Applicants submit they are inadequate to support proper 35 U.S.C. §102(b) and

RECEIVED
CENTRAL FAX CENTER

Application No.: 10/644,947
Amendment dated: October 10, 2006
Reply to Office Action dated: April 10, 2005

OCT 10 2006

§103(a) rejections, independent claim 23 should be allowed. Claims 24-32 depend from allowable independent claims and therefore are allowable as well.

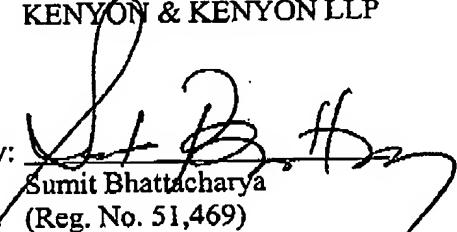
It is believed that this Amendment places the application in condition for allowance, and early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

The Office is hereby authorized to charge any fees, or credit any overpayments, to Deposit Account No. 11-0600.

Respectfully submitted,
KENYON & KENYON LLP

Dated: October 10, 2006

By: 
Sumit Bhattacharya
(Reg. No. 51,469)

KENYON & KENYON LLP
333 West San Carlos St., Suite 600
San Jose, CA 95110

Telephone: (408) 975-7500
Facsimile: (408) 975-7501